

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

KIMBERLEE VEN HOUSEN,

Plaintiff,

Case No.: 20-CV-1097

v.

WINNEBAGO INDUSTRIES, INC.,
MERCEDES-BENZ USA LLC and RV
WORLD INC. OF NOKOMIS d/b/a
GERZENYS RV WORLD,

Defendants.

and

STATE FARM AUTO INSURANCE COMPANY
OF BLOOMINGTON, ILLINOIS,

Plaintiff,

Case No. 20-CV-1099

KIMBERLEE VEN HOUSEN,

Involuntary Plaintiff,

v.

WINNEBAGO INDUSTRIES, INC. and
MERCEDES-BENZ USA, LLC,

Defendants.

**MERCEDES-BENZ USA, LLC'S NOTICE OF MOTION
AND MOTION FOR SUMMARY JUDGMENT**

NOW COMES the defendant, Mercedes-Benz USA, LLC (MBUSA), by its attorneys, Hinshaw & Culbertson LLP, and moves the Federal District Court for the Eastern District of Wisconsin, the Honorable Nancy Joseph presiding, as follows:

1. For an order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting MBUSA summary judgment on all claims and causes of action in the above-captioned matter.

2. For an order pursuant to Rule 56 of the Federal Rules of Civil Procedure awarding MBUSA its costs associated with this motion, including attorney's fees.

The grounds for this motion are set forth in the accompanying brief, declarations and proposed findings of fact, together with the pleadings and other papers already filed in this action.

Dated this 10th day of March, 2022.

s/Jeffrey S. Fertl

Jeffrey S. Fertl

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Mercedes-Benz USA, LLC

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